

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re:  
MIDNIGHT MADNESS DISTILLING LLC,  
Debtor.**

**CHAPTER 7  
Case No. 21-11750-PMM**

**BONNIE B. FINKEL, in her capacity as Chapter 7  
Trustee for Midnight Madness Distilling LLC,**

**Adv. No. 23-00047-PMM**

**Plaintiff,**

**v.**

**CASEY PARZYCH; SHAWN SHEEHAN; ANGUS  
RITTENBURG; KELLY FESTA; ASHLEIGH  
BALDWIN; MICHAEL BOYER; R.F.  
CULBERTSON; GARY PARZYCH; RYAN  
USZENSKI; POLEBRIDGE, LLC; GOOD  
DESIGN, INC.; AGTECH PA LLC; AGTECH VI,  
LLC; XO ENERGY WORLDWIDE, LLLP; XO  
EW, LLC; CAN MAN LLC; BEST BEV, LLC;  
ETOH WORLDWIDE, LLC; CANVAS 340, LLC;  
FINLAND LEASING CO., INC.; and EUGENE T.  
PARZYCH, INC.,**

**Defendants.**

**STIPULATION FOR EXTENSION OF TIME  
TO RESPOND TO AMENDED COMPLAINT**

**WHEREAS** Bonnie B. Finkel, in her capacity as Chapter 7 Trustee (the “Trustee” or “Plaintiff”) commenced the above captioned adversary proceeding by filing a Complaint on June 15, 2023 [Adv. D.I. 1];

**WHEREAS** on August 22, 2024, Plaintiff filed an Amended Complaint [Adv. D.I. 44];

**IT IS HEREBY STIPULATED AND AGREED** by and between the Plaintiff and Defendants AgTech PA LLC, AgTech VI, LLC, Ashleigh Baldwin, Best Bev LLC, Michael Boyer, Canvas 340, LLC, R.F. Culbertson, EtOH Worldwide LLC, Kelly Festa, Good Design,

Inc., Casey Parzych, Polebridge, LLC, Angus Rittenburg, Shawn Sheehan, XO EW, LLC, and XO Energy Worldwide, LLLP (collectively, the “Defendants”), through their undersigned counsel, that: 1) Defendants will have until September 30, 2024 to file responsive papers to the Amended Complaint.

Plaintiff does not waive and reserves all rights to argue that any motions to dismiss the Amended Complaint are untimely or otherwise improperly filed to the extent that Defendants had the opportunity to file a motion to dismiss the original Complaint on the same grounds and chose not to do so, or did so unsuccessfully.

Dated: August 30, 2024

**ARCHER & GREINER, P.C.**

/s/ Stephen M. Packman

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*Counsel for Defendants AgTech PA LLC,  
AgTech VI, LLC, Ashleigh Baldwin, Best Bev  
LLC, Michael Boyer, Canvas 340, LLC, R.F.  
Culbertson, EtOH Worldwide LLC, Kelly  
Festa, Good Design, Inc., Casey Parzych,  
Polebridge, LLC, Angus Rittenburg, Shawn  
Sheehan, XO EW, LLC, and XO Energy  
Worldwide, LLLP*

**COREN & RESS, P.C.**

/s/ Andrew J. Belli

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*Counsel for Plaintiff  
Bonnie Finkel, Chapter 7 Trustee*

**KURTZMAN | STEADY, LLC**

/s/ Jeffrey Kurtzman

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*Counsel for Defendants Gary Parzych, Ryan  
Uszenski, Can Man LLC, Finland Leasing  
Co., Inc. and Eugene T. Parzych, Inc.*

APPROVED BY THE COURT:

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Judge Patricia M. Mayer